MARIA-COSTANZA BARDUCCI BARDUCCI LAW FIRM PLLC 5 WEST 19TH STREET, 10TH FLOOR NEW YORK, NEW YORK 10011 TELEPHONE: 212-433-2554

January 21, 2022

Honorable Ronnie Abrams
U.S. District Court Judge
Southern District of New York

Re: Carlos Ruiz Florez, Plaintiff vs.

131 First Ave LLC and Brooklyn Dumpling Shop LLC, Defendants

Civil Action No.: 21-cv-09550-RA

Letter-Motion to Adjourn Conference and Extend Deadlines

Your Honor,

We represent Plaintiff in the above-styled action.

Pursuant to the Court's Order [DE#8], the Parties are required to file a joint letter by January 21, 2022, in advance of the scheduled initial status conference scheduled for January 28, 2022.

Plaintiff and Defendant, 131 First Ave LLC, are currently exploring the possibility of a settlement and are hopeful to be able to settle this matter in full.

Additionally, Defendant, Brooklyn Dumpling Shop LLC, has not yet appeared in this action. Plaintiff has sent Defendant, Brooklyn Dumpling Shop LLC, a warning letter advising that Plaintiff will be requesting a default if they do not file an answer or response by January 27, 2022.

For these reasons, Plaintiff requests a 40-day adjournment of the initial status conference and its associated deadlines.

Defendant, 131 First Ave LLC, does not oppose this request.

This extension will not affect any other deadlines or events in this case.

Thank you for your time in considering this request.

Most Respectfully,

BARDUCCI LAW FIRM PLLC

Application granted. The conference is hereby adjourned to March 4, 2022 at 4:00 p.m.

SO ORDERED.

Maria-Costanza Barducci Esq.

and Cotays Buduct

Hon. Ronnie Abrams

1/24/2022